



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
**REGION IX**

75 Hawthorne Street  
San Francisco, CA 94105

<http://www.epa.gov/region9/waste/enforcement/index.html>

October 15, 2012

CERTIFIED MAIL NO. 7005-2570-0001-6436-5580  
RETURN RECEIPT REQUESTED

**WARNING LETTER**

George L. Beatty  
President  
P.O. Box 1855  
Valley Center, CA 92082

EPA Identification Number: CAD982508541

Dear Mr. Beatty:

On August 9, 2012, representatives of the U.S. Environmental Protection Agency (EPA) and Rincon Band of Luiseño Indians Environmental Department (RBLI-ED) conducted an unannounced hazardous waste management compliance evaluation inspection (CEI) of the Survival Systems International (SSI) facility located in Valley Center, California. During the course of this investigation, information was gathered in accordance with Section 3007(a) of the Resource Conservation and Recovery Act ("RCRA"), as amended {42 U.S.C. § 6927(a)}.

A copy of the inspection report is enclosed for your information and response. The report describes conditions at the facility at the time of the investigation, and identifies areas of noncompliance with RCRA regulations. Any omissions in the report shall not be construed as a determination of compliance with any other applicable regulation.

Pursuant to Section 3008 of RCRA {42 U.S.C. § 6928}, you are required to correct the identified areas of noncompliance and to submit documentation of their correction to the EPA.

1. Provide EPA with proof that the open container holding paint debris, in the satellite accumulation area (SAA) outside the Priming Booth Building has been closed or replaced.
2. Provide EPA with proof, that you are now manifesting your shipments of hazardous waste using the RCRA HW Generator ID number (CAD982508541), or a statement to the fact that you will be using the RCRA ID number.

Documentation of your return to compliance may consist of, among other things, photographs, manifests, and revised records. Where compliance cannot be achieved within thirty (30) calendar days, you must provide to the EPA the reasons for the delay, a description of each corrective action planned, and a schedule on which each corrective action will be taken.

By copy of this letter, EPA is providing the RBLI-ED, with notice that the EPA may take appropriate enforcement action if the facility does not resolve the violations within the time specified above.

The EPA reserves the right to take further enforcement action as it deems appropriate. However, your response to this letter will be considered in determining the need for further enforcement action. RCRA Subtitle C violations such as those listed in the Enclosure may be punishable by civil and criminal actions, including penalties of up to \$37,500 per day for each violation, as provided by Section 3008 of RCRA.

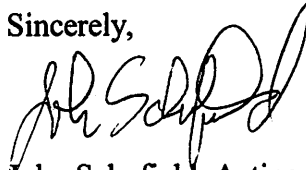
The EPA routinely provides copies of inspection reports to state or tribal agencies, and upon request, to the public. Such releases are handled according to the Freedom of Information Act regulations, 40 C.F.R. Part 2, Subpart B. For any portion of the information included in this inspection report which is entitled to confidential treatment, please assert a confidentiality claim in accordance with 40 C.F.R. § 2.203(b). If the EPA determines that the information so designated meets the criteria set forth in 40 C.F.R. § 2.208, the information will be disclosed only to the extent, and by means of the procedures specified in 40 C.F.R. Part 2, Subpart B. As described in 40 C.F.R. § 2.203(a)(2), the EPA will construe the failure to furnish a confidentiality claim within fourteen (14) calendar days from the date of your receipt of this letter as a waiver of that claim, and information may be made available to the public by the EPA without further notice.

In lieu of submitting the requested response by certified mail, SSI may submit the response as portable document file(s) via electronic mail to [fernandez.daniel@epa.gov](mailto:fernandez.daniel@epa.gov).

Daniel Fernandez  
Mailcode: WST-3  
RCRA Enforcement Office  
U.S. Environmental Protection Agency  
75 Hawthorne Street  
San Francisco, CA 94105

If you have questions related to the inspection report or this letter, please contact Daniel Fernandez of my staff at (415) 972-3299 or at [fernandez.daniel@epa.gov](mailto:fernandez.daniel@epa.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "John Schofield", written in a cursive style.

John Schofield, Acting Manager  
RCRA Enforcement Office

cc (w/enclosure): Tiffany Wolfe, Program Coordinator  
Rincon Band of Luiseño – Environmental Department  
[twolfe@rincontriibe.org](mailto:twolfe@rincontriibe.org)